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CONVENTION ON THE CONSERVATION OF EUROPEAN
WILDLIFE
AND NATURAL HABITATS

Standing Committee
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**Follow-up Recommendations 98 (2002) and 212 (2021) on
the project to build a motorway through the Kresna
Gorge (Bulgaria)**

**- JOINT REPORT BY THE COMPLAINANT AND THE
GOVERNMENT -**

*Document prepared by
Ministry of Environment and Water, Bulgaria
and
Save the Kresna Gorge Coalition of NGOs*

Update for the Autumn Bureau Meeting

Complaint No. 2001/4 and Recommendations No. 98 (2002) and 212 (2021) on the project to build a motorway through the Kresna Gorge (Bulgaria) (Struma Motorway Lot 3.2)

Progress since July 2026

18 September 2026

I. Update of the "Road Map" – Decision No. 712 of the Council of Ministers of 10 September 2026

The proposal for amending the Road Map was discussed and approved by the informal meetings of working group in the spring of 2026.

On 10 September 2026 the Council of Ministers adopted Decision No. 712, amending Decision No. 62 of 2025 on the adoption of the Road Map for the completion of the Struma Motorway. The Decision makes two changes:

- the coordination of the Road Map is passed to the Minister of Environment and Water;
- an update of the deadlines under the Road Map is adopted with regard to the steps securing the Sofia–Kulata transport route in the Simitli–Kresna section outside the Kresna Gorge.

The update reflects the actual progress of the implementation of the road map to date.

Action	Deadline under the Road Map	Status as of 31 July 2026	Updated deadline
6. Performance of the public procurement contract (preliminary design and environmental studies)	Minimum 6 months	Stage 1 (90 days) – completed, not yet accepted by the contracting authority; Stage 2 – 270 days, without suspension of the contract; Stage 3 – 90 days, after the EIA decision	–
7. Notification of the competent environmental authority and conduct of the procedure under the environmental legislation (EIA/AA)	At the earliest possible stage, not later than 6 months from the start of the contract; the procedure – not later than 12 months from the notification	The notification has been submitted by the contractor to the Road Infrastructure Agency (RIA); Stage 2 of the contract covers the preparation of the EIA and AA reports	Notification: August 2026 Submission of the EIA report: December 2026 (indicative) EIA decision: March 2027 (indicative)
8. Public procurement procedure for design (technical design and detailed master plan) and construction	Up to June 2027	Follows the EIA decision	Launch: June 2027 Contract: December 2027
9. Technical design and detailed master plan	December 2027	6 months from the award	June 2028
10. Procedure and approval of the detailed master plan and land securing	September 2028	–	April 2028
11. Completion of the construction	June 2031	–	December 2031

II. Environmental assessment procedure (EIA/AA)

The new EIA and Natura 2000 Appropriate Assessment procedure is the critical step of the Road Map. It is to assess the amended motorway project, including the second transit route – the western carriageway in the Sofia–Greek border direction – outside the Kresna Gorge.

As of 17 September 2026 preparatory steps for the initiation of the procedure are ongoing. The timing of the procedure is linked to the need to establish the appropriate starting point of the new carriageway, which requires the completion of certain spatial planning procedures.

The delay carries over to the subsequent steps, but can still be offset with acceleration of subsequent procedural steps. The expert group agreed on specific deadlines to that end (see Section III).

III. Work of the permanent expert group monitoring the project and the implementation of the "Road Map"

The work of the group has now been resumed with the amendment of the Decision. The group was reconstituted by Order No. RD-711 of 16 September 2026 of the Minister of Environment and Water. The representatives of the institutions remain the same as much as possible to ensure consistency and continuity of the cooperation.

The first meeting of the group in its new composition was held on 17 September 2026. It discussed the measures and guarantees for offsetting the delay in the EIA and AA procedure.

RIA reported on the progress of the contract for the preliminary design. The Stage 1 deliverables, including the draft notification, are to be reviewed by the Expert Technical and Economic Council (ETEC) of RIA. It was discussed and agreed by all members that the notification must be submitted promptly to keep the March 2027 deadline for the EIA decision. The NGOs stressed the need to speed up the process and to set firm deadlines for each step. The group unanimously adopted the following interim timeline:

- RIA to submit the notification to the competent authority not later than **30 September 2026**.
- MoEW to determine the applicable procedure not later than **7 October 2026**, provided the notification is filed on time.
- RIA to submit the terms of reference for the scope of the EIA report not later than **14 October 2026**.

In addition, the decision was taken to inform the heads of the relevant institutions and the Bureau of the Bern Convention of the decisions and deadlines agreed at the meeting.

IV. Conclusion

Decision No. 712 of 10 September 2026 gives the Road Map an updated timetable and a clear coordinating authority. Both were necessary after the change of governments at the beginning of 2026 and the resulting administrative vacuum.

The decisive risk remains the EIA and AA procedure, which has still not been initiated. The priorities for the coming months are therefore to ensure the keeping of the agreed timeline in order to secure an EIA Decision by the end of the first quarter of 2027.

The Government and the coalition of NGOs remain committed to working jointly on the implementation of the Road Map and will continue the joint reporting on the case.

**Complaint No. 2001/4 and Recommendations No. 98 (2002) and 212 (2021)
on the project to build a motorway
through the Kresna Gorge (Bulgaria) (Struma Motorway Lot 3.2)**

Progress since December 2025

31 July 2026

I. Work of the permanent expert group monitoring the project and the implementation of the “Road Map”

Following the resignation of the Bulgarian government in December 2025, personnel and position changes took place in the Bulgarian institutions included in the working group. From January to May the country was governed by a caretaker cabinet, which was in turn replaced by a regularly elected government, triggering further personnel changes. This political situation created an administrative and legal vacuum with respect to the formal composition of the working group, as no official update was carried out throughout this period.

The topic remained on the agenda of the Bulgarian government. On 18 March 2026 the Council of Ministers discussed the progress of the road map implementation at an operational session. In July the Minister of Environment and Water reported on the need to update the composition of the working group.

The dialogue between the institutions and the complainant continued on the basis of the trust that had been built and in a spirit of constructive cooperation, in order to ensure the consistent implementation of the adopted road map.

On 9 January 2026, following a public procurement procedure, the Road Infrastructure Agency (RIA) signed a contract for “Preparation of a preliminary design to secure the Sofia–Kulata transport route in the Simitli–Kresna section outside the Kresna Gorge”. In early April the first stage of the contract was completed, which comprised:

- a road-safety impact assessment;
- preliminary design and survey activities – a survey for the presence of existing engineering-infrastructure facilities and the preparation of an engineering-geological survey programme;
- a preliminary environmental analysis.

The approval of the first stage and the notification of the competent environmental authority, in implementation of item I.7 of the road map, together with active interaction during the environmental procedure, are forthcoming.

Between December 2025 and July 2026 a total of two informal working meetings were held among the members of the working group, as well as a number of meetings in a smaller format. These meetings, although informal, were held in accordance with the consensus principle for reaching decisions applied in the group's work.

Continuing the previous year's discussions, after the technical design for Lot 3.2.1 (the northern section of the eastern carriageway) had been prepared, a meeting was held on 18 March 2026 with the participation of the NGOs, government representatives, the designers of Lot 3.2.1 and

the team preparing the preliminary environmental analysis for the alignment of the “western” carriageway. The consensus findings of all participants in the meeting are that the technical design of the “Eastern carriageway” as a whole (Lot 3.2.1 and 3.2.2):

1. significantly reduces the impact area compared with the scope assessed in EIA Decision No. 3-3/2017 and Decision No. 5-PR/2024 (by nearly 40%);
2. has provided the necessary mitigation measures and defragmentation facilities, integrated with the western carriageway;
3. makes it possible to reduce the potential cumulative impacts of the two carriageways to below 1% of the area of the protected habitats;
4. is fully compliant with the recommendations of the Standing Committee of the Bern Convention of 2025.

The participants further agreed that this makes it possible to define a technical solution for constructing the western carriageway immediately adjacent to the eastern one. The need to accelerate the design of the western carriageway and the preparation of the preliminary environmental analysis for it was also discussed.

On 20 April 2026 a second informal meeting was held with the NGOs, government representatives and the contractor of the “Preparation of a preliminary design to secure the Sofia–Kulata transport route in the Simitli–Kresna section outside the Kresna Gorge” contract. The proposed technical solution and its preliminary environmental analysis were considered. The following circumstances were established by consensus of all participants:

5. The proposed technical solution is aligned and integrated with the technical designs of Lot 3.2.1 and Lot 3.2.2 of the eastern carriageway;
6. The technical solution is consistent with the recommendations of the 44th meeting of the Standing Committee that it be positioned immediately adjacent to the “eastern” carriageway and include mitigation measures and defragmentation facilities integrated with the “eastern” carriageway;
7. the preliminary environmental analysis shows that it is possible to reduce direct habitat damage to below 1% for the entire integrated project;
8. with the reduced construction footprint of the eastern carriageway, constructing this carriageway along the proposed alignment is expected not to harm the integrity of the protected zones.

The discussions led to the conclusion that the selected alignment can perform the function of the western carriageway of the motorway, thereby achieving a minimal environmental footprint and fulfilling the recommendations from the decision of the 45th Standing Committee of the Bern Convention. The question of the future EIA was then discussed. The NGOs emphasised that it is crucial for the EIA procedure to be started as soon as possible, no later than June 2026, and all participants agreed by consensus that the applicable procedure is a notification for an amendment of the investment proposal approved by EIA Decision No. 3-3/2017. The NGO representatives undertook to submit, without delay, their opinion on the scope of the new EIA, which was presented to the contracting authority (RIA) and the contractor on 1 June 2026. The NGOs indicated that they would organise a public consultation in the town of Kresna on the scope of the new EIA, and the government representatives proposed that the meeting be organised jointly, which was accepted by the NGOs.

NGOs express concern that the new EIA procedure has not yet been initiated. In their view, this could jeopardize the timely completion of this motorway section outside the Kresna Gorge.

In their assessment it is currently still possible offset the delay, provided that timely and accelerated actions are taken to conduct the procedures.

In addition, the deadlines set out in the road map and the composition of the working group should be updated, in order to ensure, to the greatest possible extent, the continued active participation of the stakeholders at every subsequent stage.

II. Implementation of temporary mitigation and safety measures

RIA provided a design for the implementation of mitigation measures aimed at reducing species mortality along the existing road I-1 in the Kresna Gorge. In response, the NGO representatives and the herpetologist experts expressed the view that all reptile fencing facilities should be removed from the measures – owing to the need to ensure the reptiles' daily movements in order to preserve the quality and viability of the populations, including juveniles – and that only the fencing facilities providing local guidance of individuals towards the entrances of the defragmentation facilities should be retained. To date, no expert agreement has been reached on the necessary changes to the design, and the measures have therefore not been implemented. In addition, as already reported, their implementation is impossible during the summer season due to heavy traffic.

With regard to item II.2, RIA currently maintains the flexible delineator posts restricting overtaking, which continue to have a positive effect in preventing accidents on this critical road section.

III. Conclusion

Despite the political situation in Bulgaria and the change of governments in early 2026, the consistent position of the institutions and the commitment to implementing the road map are being maintained. The constructive and active working dialogue with the NGO representatives and the expert discussion of every step of the project's implementation continue. The forthcoming update of the road map and of the composition of the working group will formalise this process and ensure its continuation, so as to pre-empt the environmental, technical and financial challenges that the project continues to face.